

Application No.: 10/085258

Docket No.: SMQ-083

REMARKS

Upon entry of this response, claims 1 and 20 are amended for minor informalities. Hence, claims 1-28 are pending, of which claims 1, 11, 19, 20, 26 are independent. Applicant respectfully submits that the pending claims define over the art of record.

Rejection of Claims

Claims 1-28 are rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent No. 6,167,448 to Hemphill et al. (hereafter "Hemphill"). Applicant respectfully traverses this rejection for the reasons set forth below.

Claims 1-10 and 20-25

Independent claims 1 and 20 both recite the limitation of dynamically registering a plug-in *in application* with the program *without* ceasing the execution of the program and the plug-in application operating in conjunction with the program to provide enhanced functionality of the program. Applicant respectfully submits that Hemphill fails to disclose this limitation.

The Examiner notes on page 9 of the Office Action that plug-ins are software components that extend the functionality of a browser and that plug-ins are typically implemented as dynamically linked libraries (DLLs). The Examiner seems to take the position that the program and plug-in *application* in independent claims 1 and 20 are equivalent to a browser and DLL, respectively. Applicant respectfully submits that although DLL may be considered as a plug-in, it is not an application. Additionally, the Hemphill reference does not expressly or inherently disclose the use of any plug-ins for the web browser 106. See Fig. 1. Applicant respectfully submits that to establish a prima facie case of anticipation, a single prior art reference must disclose each and every element and limitation of the claimed invention.

The Examiner notes on page 10 of the Office Action that HMMO (Hyper-Media Managed Objects) must also be considered as plug-ins. Applicant respectfully submits that the Examiner seems to take the position that the HMMO is equivalent to plug-in *application* in independent claims 1 and 20. Applicant respectfully notes that HMMO is an object and not to be considered as an *application* as the Hemphill reference also discloses HMMA (Hyper-Media

Application No.: 10/085258

Docket No.: SMQ-083

Managed Application), which is an application and different from HMMO. Applicant respectfully submits that HMMO is not a plug-in *application*.

Applicant respectfully submits that the Hemphill reference fails to disclose the limitation of dynamically registering a plug-in application *with* the program *without* ceasing the execution of the program. The Examiner notes on page 10-11 of the Office Action that in Hemphill Col. 4, lines 35-40, Col. 5, lines 40-41, Col. 6, lines 5-10, the reference discloses that management server is independently discovering and registering the plug-in applications, so the Examiner concludes that the registration of the plug-in applications occur without ceasing the execution of the browser. Applicant respectfully disagrees. In the cited section, Hemphill discloses that management server 102 performs management services to discover managed elements 104 of the management network 100. Nowhere in the Hemphill reference does it disclose registration of a plug-in application. Claims 1 and 20 require that the registration of an plug-in application *with* the program *without* ceasing the execution of the program and therefore even if the Examiner's characterization of Hemphill is true, the Examiner fails to show that Hemphill discloses that management server is registering plug-in applications *with* the browser *without* ceasing the execution of the *browser*. Applicant respectfully submits that Hemphill does not disclose the management server registers discovered plug-in modules with a browser application to enhance the browser application's functionality.

Therefore, Applicant respectfully submit Hemphill does not disclose the limitation of dynamically registering a plug-in *application* with the program *without* ceasing the execution of the program and the plug-in application operating in conjunction with the program to provide enhanced functionality of the program, as required by independent claims 1 and 20.

Additionally, as the preamble of claims 1 and 20 set out, the steps are performed within an electronic device. However, in Hemphill, the web browser is on a client system 106, the management server 102 is on a separate device, and HMMO 111 is on a HMMD 110, a separate device from both management server 102 and client system 106.

Accordingly, Hemphill fails to teach each and every element and limitation of claims 1 and 20. Applicant respectfully request that the Examiner reconsider and withdraw the rejection of claims 1 and 20 and their dependent claims.

Application No.: 10/085258

Docket No.: SMQ-083

Applicant notes that dependent claims 2-10 and 21-25 also recite separate patentable subject matter. For example, claims 2 and 21 recite the element of providing a registration descriptor holding information regarding the plug-in application and processing the registration descriptor to complete the registering of the plug-in application. The Examiner speculates that Hemphill discloses these elements in Col. 10, lines 1-25 and Col. 13, lines 40-60. Applicant respectfully disagrees. In these cited sections, Hemphill discloses how an ENM (event notification message) can be formulated by a managed device 202 for sending to a management server 220 via a network 250. Applicant respectfully submits that registration descriptor is very different from an ENM. A registration descriptor holds information regarding the plug-in application, whereas the event notification message does not. Furthermore, the claimed invention requires that the registration descriptor to be processed to complete the registration of the plug-in application. However, an ENM merely provides information regarding a management event, and is not processed so that registration of a plug-in application is completed.

Claims 11-18 and 26-28

Independent claims 11 and 26 include the limitations that information regarding an application is provided at a specified storage location and in response to the information being at the specified storage location, registering the application for use in conjunction with a program on the server to provide additional functionality for the program.

The Examiner speculates that Hemphill discloses these limitations at Col 10, lines 1-25 and Col. 4, Lines 5-30. In the cited section, Hemphill discloses that plug-in modules are used to expand the capabilities of HMMA. However, Hemphill does not disclose the registration of these plug-in modules with the HMMA. Hemphill also does not disclose information regarding the plug-in modules being stored at a specified storage location and that in response to the information being at the specified storage location, the plug-in modules are registered for use in conjunction with the HMMA. Although Hemphill discloses that an ENM may be sent from a managed device to a management server via a

Application No.: 10/085258

Docket No.: SMQ-083

network, Hemphill does not disclose that information regarding an application is stored at a specified storage location and that in response to the information being at the specified storage location, the application is registered for use with the program as required by independent claims 11 and 26.

Accordingly, Hemphill does not disclose each and every element and limitation of independent claims 11 and 26. Applicant respectfully requests that the Examiner reconsider and withdraw the rejection of independent claims 11 and 26 and their dependent claims.

Applicant notes that the dependent claims also recite separate patentable subject matter. For example, claim 12 includes the limitation of processing the information regarding the application to perform the registration of the application with the program. Hemphill fails to disclose this limitation.

Claim 19

Claim 19 requires the limitations of providing information regarding add-on programs at a location and processing the information to register the add-on programs with a software management package. Hemphill discloses that plug-in modules are used to expand the capabilities of HMMA. However, Hemphill does not disclose the registration of these plug-in modules with the HMMA. Hemphill also does not disclose information regarding the plug-in modules being stored at a specified storage location. Although Hemphill discloses that an ENM may be sent from a managed device to a management server via a network, Hemphill does not disclose that information regarding add-on programs is stored at a specified storage location and the information is processed to register the add-on programs with a software management package. Applicant respectfully submits that sending and receiving a message is very different from processing information *to register* add-on programs.

Accordingly, Hemphill fails to disclose each and every element and limitation of claim 19. Applicant respectfully request that the Examiner reconsider and withdraw the rejection of claim 19.

Application No.: 10/085258

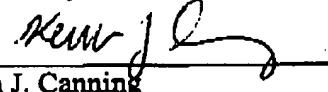
Docket No.: SMQ-083

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

Applicant believes no fee is due with this statement. However, if a fee is due, please charge our Deposit Account No. 12-0080, under Order No. SMQ-083 from which the undersigned is authorized to draw.

Dated: November 8, 2005

Respectfully submitted,

By 
Kevin J. Canning
Registration No.: 35,470
LAHIVE & COCKFIELD, LLP
28 State Street
Boston, Massachusetts 02109
(617) 227-7400
(617) 742-4214 (Fax)
Attorney For Applicant